## Message

From: Dermer, Michele [Dermer.Michele@epa.gov]

**Sent**: 8/15/2013 5:32:14 PM

To: Robin, George [Robin.George@epa.gov]; R9-Deep [R9Deep@epa.gov]

**Subject**: RE: Cat Canyon Sisquoc AE application

The e-mail search function is very poor on OWA lite (there is none) so i will look tomorrow for the GIS requirements information I think i had sent Jerry and forward to you.

Regarding DOGGR "analysis", there is a boilerplate form in Guidance 34 that is supposed to be prepared by DOGGR. They did this work for the Asphalto exemption we approved in the past but it is absent in this submittal.

From: Robin, George

Sent: Thursday, August 15, 2013 9:46 AM

To: Dermer, Michele; R9-Deep

Subject: RE: Cat Canyon Sisquoc AE application

Thanks Michele,

Yes the perspective is good to know, but I still need a better clue on the specifics like "GIS Coordinates" and DOGGR's "Analysis"

Regarding David and Tim, such a conversation is good and valuable, however the technical undertaking is what I am after. I think these two can occur concurrently.

I will let you all know when we get videoing.

## George

----Original Message----From: Dermer, Michele

Sent: Thursday, August 15, 2013 9:35 AM

To: Robin, George; R9-Deep

Subject: RE: Cat Canyon Sisquoc AE application

Hi George,

I will try to locate the e-mail i thought i had already provided to Jerry about the GIS requirements. They come from Bob Smith/Joe Tiago. at our HQ. To clarify, we still want T,R,S, but also the GIS coordinates so HQ can input them into a nationwide map of exemptions, which we don't presently have. HQ has decided this is a priority -- to have one place where depictions of all exemptions reside. They have already begun the compilation, as has DOGGR for CA exemptions -- they showed us what they had so far in February.

Regarding the state providing their own analysis I had discussed this with Tim previously and they elected to withdraw this application so they could include the analysis. But they have still not provided that information. I suggest David call Tim to discuss before we spend much more time.

Michele

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From: Robin, George

Sent: Thursday, August 15, 2013 9:03 AM

To: Dermer, Michele; R9-Deep

Subject: RE: Cat Canyon Sisquoc AE application

thanks Michele, yes we want what HQ wants and this is a necessary time to specify all those "wants." The consultant for Cat Canyon has/will have numerous clients in addition to Cat Canyon toward this statewide effort. The video conference is necessary to include guidance and specifics so that the DOGGR Districts have the same information communicated to them.

GIS based maps are probably, readily possible (and the expense is not outrageous) at this time, however yes, we do want the T-R-S to accompany all applications. I highly recommend that we have the whole group in on this effort. The last chance anyone had to get this kind of in-depth perspective was back in 1981, so this is significant.

I need to know what "GIS tracking" is all about such as how it is applied to an Aquifer Exemption candidate that is not accessible via surface, so there must be a conversion to digital, which of course must come from T-R-S and the geologist's delineation off the structure maps, etc......it all sounds good, but we'll see if 21st century has arrived. I remember discussing GIS with Cheryl Henley back in the mid-90s, who thought that a California map could be constructed from well data.

I will let everyone know when the video conferencing scheduling time comes up.

## George

From: Dermer, Michele

Sent: Wednesday, August 14, 2013 3:39 PM

To: Robin, George
Cc: Albright, David

Subject: RE: Cat Canyon Sisquoc AE application

I have not taken the time to review the document, but as before, there does not seem to be any analysis by DOGGR to support this action. Also, I thought I had provided the GIS data tracking input that will need to be provided - our HQ is requesting this for input into a nationwide tracking system, assuming the exemption is granted. They want to be able to map all AE in GIS (not by T,R,S) and I do not see that level of geographic detailed included - but I have not thoroughly reviewed.

From: Robin, George

Sent: Wednesday, August 14, 2013 1:27 PM

To: Salera, Jerry@DOC

Cc: Ricker, Michelle; Albright, David; Dermer, Michele; R9-Deep

Subject: RE: Cat Canyon Sisquoc AE application

Hi Jerry and Michelle,

Yes, please provide a hard copy of the application. That copy will not need to be duplicated if further records such as exchanges between agencies (esp. the Regional Board) and the public (esp. during the public comment period) become part of the record as supplemental material to this application.

In a phone conversation I had with Michelle last month while you were on leave, we discussed the possibility of video conferencing while considering this case, and including the context of a larger set of future Aquifer Exemptions in California. One issue was dealing with the definition of "commercial quantities" of oil & gas. No doubt this can be quite an elusive term to address, if there is no guiding approach that is acceptable. Further, the EPA has begun a nationwide effort toward Aquifer Exemptions that includes the goal of standardizing as much as possible while obtaining a digitized version of these records.

I will proceed with downloading the digital version of the application in the meantime with Cat Canyon as the current task at hand.

Will you all please let us know if further conferencing sounds feasible. In the initial stages, I wish to consider Michelle's firm's perspective while we examine the larger aquifers in the state. We still need to work out any technical, internet connection bugs we experienced furing the last video session. Additionally, a day's trip to Sacramento is readily arranged.

George

George Robin

(robin.george@epa.gov<mailto:robin.george@epa.gov<mailto:robin.george@epa.gov%3cmailto:robin.george@epa.gov>>)

Engineer, Underground Injection Control

US EPA, Region IX

Phone (415) 972-3532

75 Hawthorne St.

Fax (415) 947-3549

Ground Water Office

Mail Code: WTR-9

San Francisco, CA 94105

From: Salera, Jerry@DOC [mailto:Jerry.Salera@conservation.ca.gov]

Sent: Tuesday, August 13, 2013 5:49 PM

To: Robin, George

Cc: Ricker, Michelle

Subject: Cat Canyon Sisquoc AE application

Hi George,

This is about the Cat Canyon aquifer exemption application for the Sisquoc formation that an operator, ERG Operating Company has been working on for some time now. The Sisquoc is a primacy-exempted zone in as far as the "shaded areas" have been defined in the primacy application. Since primacy, the hydrocarbon areas have expanded and thus, the basis for this application.

We have had discussions of this application before in several phone calls and email exchanges. This document has undergone several iterations to make it more complete and clearer. As you can see, if you compare the document that you have gotten initially and this one, you will note that there's been substantial improvements to the content and exhibits, including, among other items:

1. A more thorough characterization of the Sisquoc aquifer 2. Contours of the Sisquoc oil sands mapped with reference to the proposed areas for exemption

This is not yet a formal submission as we still need to compete the agency and public notice process. However, kindly let me know if this document as presented is already substantially complete, so that we can initiate the notification and public review process.

This document is about 40 Mb, so I would like to request you to download this from the link below:

https://app.smartsheet.com/b/download/att/a\_oBUpOeGMoSb8EXTD00t35-cecrCHGrqEHlgvz3Yp4

I know EPA is trying to go paperless but if there's a need to have hardcopies, kindly let me know. I have cc: ed Michele Ricker of SCS Consultants in this message so that she will be cue'd if you need to have these sent to you.

Thank you and please let me know if you want to discuss at your convenience.

Jerry Salera

Underground Injection Control (UIC) Program CA Division of Oil, Gas and Geothermal Resources

801 K Street, MS 20-20

Sacramento, CA 95814

Tel: 916-323-1781 Fax: 916-323-0424

Jerry.Salera@conservation.ca.gov<mailto:Jerry.Salera@conservation.ca.gov<mailto:Jerry.Salera@conservation.ca.gov